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12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,) NO. 4:21-mj-71085-MAG
17 Plaintiff,)
18 v.) STIPULATION AND ORDER CONTINUING
19 ROSS KLINGER,) STATUS CONFERENCE AND EXCLUDING
20 Defendant.) TIME UNDER THE SPEEDY TRIAL ACT AND
21) FEDERAL RULE OF CRIMINAL PROCEDURE
22) 5.1(c) AND (d)
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19 A status conference in the above-captioned case is scheduled for December 3, 2021. Counsel for
20 the United States and counsel for the defendant jointly stipulate and request that that status conference
21 be continued to January 10, 2022, and that time be excluded under Federal Rule of Criminal Procedure
22 5.1(c) and (d), and the Speedy Trial Act from December 3, 2021 to January 10, 2022.

23 The government and counsel for the defendant have agreed that time be excluded under Federal
24 Rule of Criminal Procedure 5.1 and the Speedy Trial Act so that defense counsel can continue to
25 prepare. The government has produced significant discovery to defense counsel and is planning on
26 producing an additional production shortly. For these reasons, the parties stipulate and agree that
27 excluding time until January 10, 2022, will allow for the effective preparation of counsel. *See* 18 U.S.C.

28 STIPULATION TO EXCLUDE TIME
AND ORDER

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1 § 3161(h)(7)(B)(iv); FRCP 5.1(c) and (d). The parties further stipulate and agree that the ends of justice
2 served by excluding time from December 3, 2021 to January 10, 2022, from computation under the
3 Speedy Trial Act and Federal Rule of Criminal Procedure 5.1(c) and (d) outweigh the best interests of
4 the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

5 The undersigned Assistant United States Attorney certifies that she has obtained approval from
6 counsel for the defendant to file this stipulation, request, and proposed order.

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8 IT IS SO STIPULATED.

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10 DATED: December 2, 2021

/s/ Molly K. Priedeman
MOLLY K. PRIEDEMAN
Assistant United States Attorney

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12 DATED: December 2, 2021

/s/ John Paul Reichmuth
JOHN PAUL REICHMUTH
Attorney for the Defendant

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28 STIPULATION TO EXCLUDE
TIME AND ORDER

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ORDER

2 Based upon the representations of counsel and for good cause shown, the Court finds that failing
3 to exclude the time from December 3, 2021 to January 10, 2022, would unreasonably deny defense
4 counsel and the defendant the reasonable time necessary for effective preparation and continuity of
5 counsel, taking into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv). The Court
6 further finds that the ends of justice served by excluding the time from December 3, 2021 to January 10,
7 2022, from computation under the Speedy Trial Act and Federal Rule of Criminal Procedure 5.1(c) and
8 (d) outweighs the best interests of the public and the defendant in a speedy trial. Therefore, and with the
9 consent of the parties, IT IS HEREBY ORDERED that the time from December 3, 2021 to
10 January 10, 2022, shall be excluded from computation under the Speedy Trial Act and Federal Rule of
11 Criminal Procedure 5.1(c) and (d) and the status conference is continued to January 10, 2022 at 10:00
12 a.m.

IT IS SO ORDERED.

DATED: December 2, 2021

